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**“Shared Service Center”**

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**CONTENTS**

**Executive Summary ..... ii**

**Introduction ..... 1**

**Definitions ..... 2**

**Applications ..... 4**

**Advantages ..... 7**

    1. Cost Advantages..... 7

    2. Service Advantages ..... 8

    3. Strategic Advantages..... 9

**Risks..... 12**

    1. Financial Risk..... 12

    2. Process Risk ..... 13

    3. Employee Risk ..... 13

    4. Disaster Risk ..... 14

**Evolvement over Time ..... 15**

    1. Cost Orientation ..... 15

    2. Customer Orientation ..... 16

    3. Market Orientation ..... 16

    4. Profit Orientation..... 17

**Conclusion..... 18**

**Notes ..... 21**

**Bibliography ..... 22**

## **Executive Summary**

Shared services are a method to provide back-office functions to internal customers at lower costs and higher quality. Shared services have started out in the area of finance and accounting. Accounts payable, bank reconciliation, general ledger, fixed assets and accounts receivable are still the most common functions that are transferred to a Shared Service Center (=SSC). However, in the last few years shared services have expanded into other areas, such as information technology, human resources, and procurement.

Shared services have cost, service, and strategic advantages. Cost advantages result from economies of scale and scope, site advantages, standardization, and reduced IT-costs. Increased service levels come from higher expertise through specialization, higher customer orientation, and from managing expectations better through service level agreements (SLAs). Strategic advantages play an important role as well. Business units can focus on their operational activities, know-how that can be leveraged for other activities remains inside the organization, there is reduced dependency from outside providers, easier access to information, and more flexibility for reorganizations.

However, there are also risks when moving to shared services. Financial risk includes the possibility that establishing a SSC is more costly than expected and that operating costs are higher than planned. Process risk stems from the fact that there may be reduced flexibility for individual business needs and reduced process quality and responsiveness. Employee-related risk is present as well. Reduced morale, resistance to change, and loss of know-how need to be overcome. Finally, force majeure type events are a bigger threat when all support processes are managed from one location.

Shared services are not a static concept. Companies focus initially on cost reductions for repetitive, transactional processes. Later on, higher value added services are included in the SSC and the business units are allowed to determine the scope and frequency of the services they receive. SLAs are concluded and deviations are monitored continuously. Shared service pioneers have already entered a market orientation stage. Apart from serving internal clients they also deal with external clients. Market prices are used for both types of customers. In the final stage, a SSC becomes a business unit that is run for profit and that provides outsourcing services to predominantly external customers.

The shared services wave has not yet reached its peak yet. Many companies are still expanding its scope and some sectors are still at the beginning of their shared service journey.

## Introduction

Traditionally, both private and public sector<sup>1</sup> organizations have performed back-office functions in each of their business units<sup>2</sup>. In many cases autarkic business units, which were responsible for all aspects of their respective businesses, have grown historically. In others, responsibilities were shifted consciously to the operating entities, which, after all, knew better what support services they needed.

Nowadays, organizations have realized that they no longer can afford the luxury to duplicate their support processes in each business unit. An increasing number of organizations, both in the private and in the public sector, use SSCs to transform their back-office functions. The reason for this is quite simple: it is one of the rare business concepts that offer both a decrease in costs and an increase in quality simultaneously.

Various factors contribute to the widespread use of SSCs. First of all there is the enormous rise in information availability due to networks. Because of the advancements in communication technology, proximity is often no longer required and activities, which previously had to be carried out at a particular place, can easily be performed elsewhere. American corporations were the first to discover, that just shifting some back-office-functions from high-cost urban locations, such as Manhattan, to lower cost rural functions, such as South Dakota, can result in significant cost savings.

European<sup>3</sup> companies traditionally have lagged behind<sup>4</sup>. Differing legislative requirements, languages and currencies had been obstacles to the fast adoption of the shared services concept. However, in the last decade numerous factors allowed European corporations to follow their American counterparts:

- Various EU guidelines harmonized the legal environment and created a common market
- The increasing European integration questioned the common business practice to establish subsidiaries with its own accounting, IT and HR department in each country
- The introduction of the Euro facilitated cost comparisons between operations in different countries
- The recent enlargement of the EU from 15 to 27 member states created a pool of countries with a highly educated workforce, but much lower labor costs.

This paper attempts to analyze whether shared services are really a panacea. It defines what shared services are, gives an overview about their major applications and describes their advantages and disadvantages. Bearing in mind that shared services are not a static concept, but that the shared services model evolves over time, the traditional life cycle of a SSC is described as well.

## **Definitions**

It is not exactly clear who coined the term “shared services” for a way to perform back-office functions or which company built the first SSC. Some sources claim that Jim Bryant was the first to use this term when carrying out a project for Baxter Healthcare in the late 1980s<sup>5</sup>.

Others state that Bob Gunn of A.T. Kearney was the first to use it when doing a best practice study<sup>6</sup>.

It is undisputed, though, that the shared services concepts originated in the US in the 1980s. Also, it is clear that the area of finance and accounting was its first application. General

Electric has been credited for being the first company to actually build a financial shared service center for its various business units in the 1980s<sup>7</sup>. After having pursued a decentralization strategy, granting its business units autonomy in managing all their activities, GE realized that it actually had 45 accounts payable, 44 general ledgers and 37 fixed asset systems<sup>8</sup>. Moving to shared services allowed the company eventually to reduce the number of systems by 80%<sup>9</sup>. In the last years, shared services have been expanded to many more internal support services, especially in the area of IT, HR, and procurement.

Table 1 lists some of the most cited definitions of shared services. Although there are some variations, there is a common understanding that shared services are used to

- provide support activities
- to internal customers
- at lower costs
- and at a higher quality.

Schulmann et al. 1999, p.9	The concentration of company resources performing like activities, typically spread across the organization, in order to service multiple internal partners at lower cost and with higher service levels, with the common goal of delighting external customers and enhancing corporate value.
Quinn et. al., 2000, p. 11	...refers to the practice of business units, operating companies and organizations deciding to share a common set of services rather than have a series of duplicate staff functions.
Kagelmann, 2001, p.49	An organizational approach to provide internal services for more organizational units within an organization through the collective usage of resources.
Bergeron, 2003, p. 3	...a collaborative strategy in which a subset of existing business functions are concentrated into a new, semiautonomous business unit that has a management structure designed to promote efficiency, value generation, cost savings, and improved service for the internal customers of the parent corporation, like a business competing in the open market.

Table 1: Shared services definitions

The organizational entity that carries out shared services is referred to as SSC. More precisely, it can be defined in the following way:

“A SSC is a separate and accountable semi-autonomous unit within an (inter)organizational entity, used to bundle activities and provide specific pre-defined services, to the operational units within that (inter)organizational entity, on the basis of agreed conditions.”<sup>10</sup>

It is important to note that there are two types of SSCs: centers of transaction and centers of expertise<sup>11</sup>. The former carry out high volume / low skill activities, such as accounts payable or accounts receivable. The latter perform low volume / high skill activities, such as an in-house legal or tax advice. Having an in-house attorney may not be feasible for a particular business unit. However, taken together, all business units may have enough legal work to employ a legal expert instead of dealing with various external lawyers on a case-by-case base.

## **Applications**

Shared services are not limited to a particular industry or type of organization. Large corporations such as General Electric and Hewlett-Packard were amongst the shared services pioneers in the 1980s. Large banks adopted shared services early on as well to make their back-office processes more efficient. Since then, many smaller companies and public sector enterprises have also established SSCs successfully.

But which processes should be transferred to a SSC? It is clear that only activities that are not specific to a particular business unit can be “shared”. If a certain activity is “unique” it should not be transferred to a SSC. Also, SSC only provide support processes to internal customers. Core processes that have a high strategic relevance or that involve external customers are



rarely transferred into a SSC. In sum, non-business-unit-specific support processes are the likely candidates for a SSC.

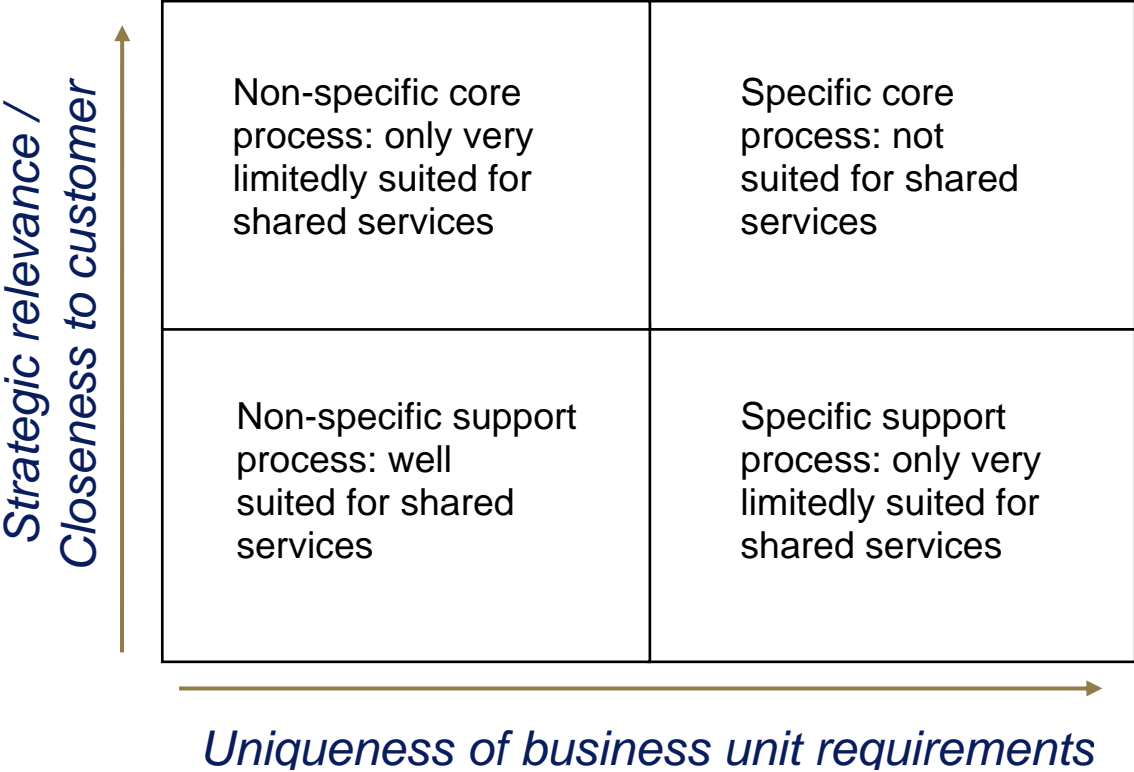


Figure 1: Criteria for the selection of shared service processes

As noted above, shared services have started out in the finance and accounting area. Companies concentrated on the low-hanging fruits first and focused on high volume / low skill activities. Many companies began their shared services journey with accounts payable. Accounts payable are non-specific to a particular business unit and very repetitive. Moreover, companies are less concerned with potential errors. In the worst case, they think, invoices are paid at a later point in time. As can be seen in Figure 2, finance and accounting processes still dominate SSCs. However, shared services have also expanded into many other areas, especially into IT, HR and procurement in the last two decades.

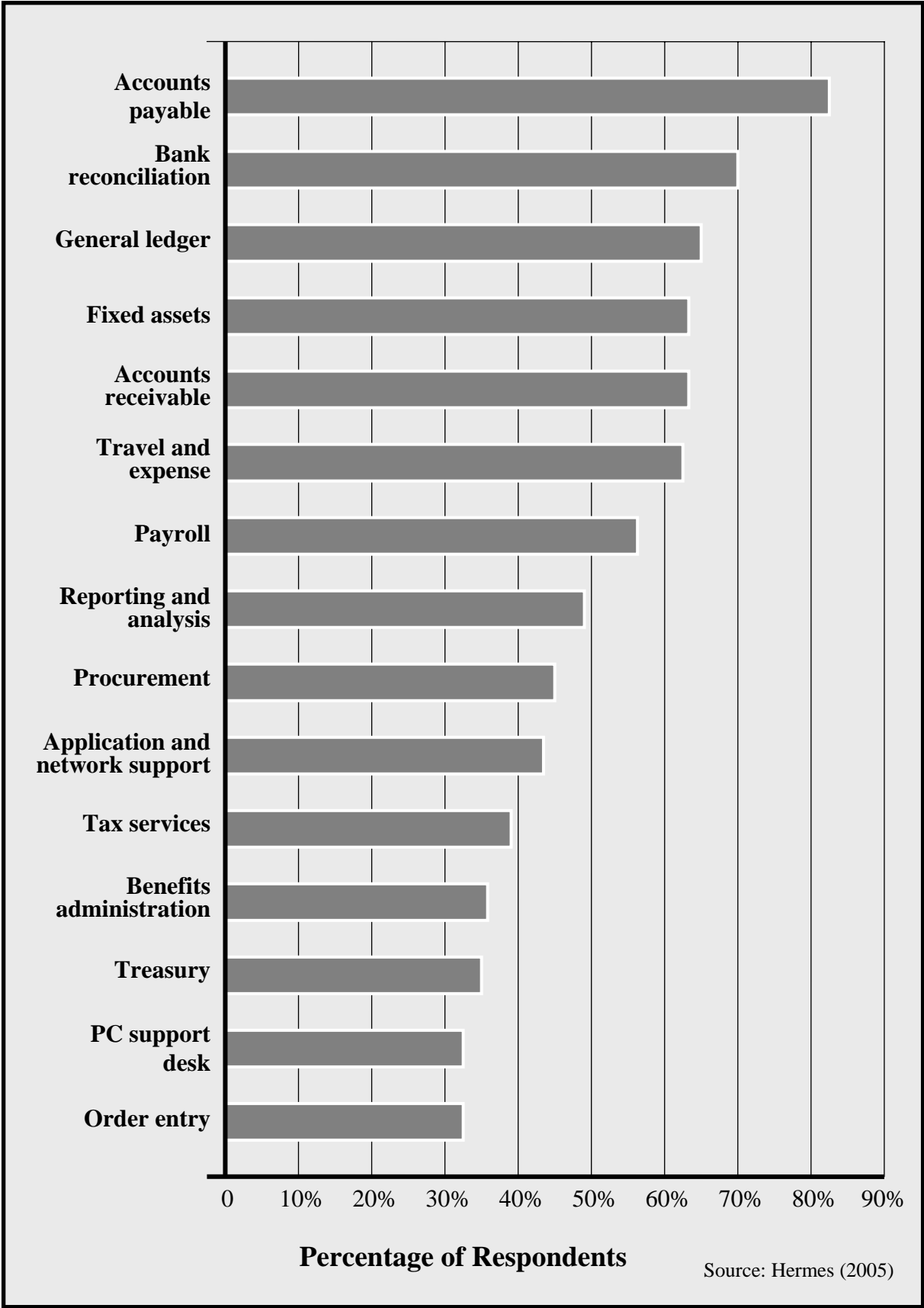


Figure 2: Most common functions in SSCs

# Advantages

The famous German sociologist Max Weber<sup>12</sup> noted that positing any typology is to invite argument. Nevertheless, I have decided to group the various advantages of shared services into three categories.

## 1. Cost Advantages

Various studies<sup>13</sup> indicate that costs, on average, can be reduced by 20-30% when a process is transferred into a SSC. Cost savings are mainly due to five areas: economies of scale and scope, site advantages, standardization and optimization, reduced soft- and hardware costs and increased transparency and accountability

- Economies of scale and scope

Bundling support activities in a single location allows fixed costs to be spread over a larger number of units and decreases average costs. The marginal costs of handling one more invoice is close to zero<sup>14</sup>. Moreover, it also helps to manage peaks in workload better.

- Reduced labor costs through the location in lower-cost areas

About two thirds of the operating costs of a shared service center are labor-related. By moving from a high cost, urban area to a low cost, rural area, significant cost savings can be achieved. By building SSC off-shore, e.g. in India, even higher cost savings can be realized. Moreover, whereas in many industrialized countries SSC jobs are not sought after by well-educated labor, in emerging economies this is different. SSC jobs “are high paying jobs in India and attract applicants with university degrees and high levels of motivation”<sup>15</sup>.

- Standardization and optimization of processes

More often than not, each business unit performed its support process slightly different. By moving to a SSC, best practices are adopted. Processes and policies become standardized at the highest level and are optimized on a continuing basis thereafter.

- Reduced soft- and hardware costs

Cost savings also result in the fact that not each business unit needs to be equipped with the latest hard- and software. Some modules may only be necessary in the SSC. Also, IT training costs for employees in the business units can be saved.

- Transparency and accountability

An old proverb states that “what gets measured, gets done”. Monitoring costs per invoice or per transaction precisely, creates incentives for actions. Business units, whose support activities are significantly above the intra-company average or external benchmarks, are held accountable and asked to improve and justify their higher expenses. The productivity of SSCs is tracked meticulously. Moreover, business units only pay for services they actually want or not. There are no “one size fits all” – reports anymore.

## 2. Service Advantages

Executives running SSCs often say that “business units come for costs, but they stay for quality”. Service advantages are achieved due to the fact that more expertise is available in the SSCs, business units are treated as real customers, service level agreements are negotiated and monitored and that customers only have to pay for services they actually want.

- More expertise through specialization

SSC can provide better services because they give “support workers a better chance to specialize and grow within their own professional environments”<sup>16</sup>. In-house counsels, for example, needed to work as generalists within their respective business units. In a center-of – expertise type SSC they can specialize on a particular aspect of law and advise more than just one business unit (e.g. labor issues).

- Higher customer orientation

Traditional back-office function providers were rarely famous for their customer focus. As a monopolist, they did not have to be. Business units received a standardized service, no matter how different their needs and priorities were. SSCs treat the business units as their customers, whose satisfaction levels are monitored periodically.

- Managing expectations through service level agreements

A SLA is a contract between the SSC and the business unit. It is much shorter than a legal contract with an external third party. It specifies the services that will be provided and the prices to do so. It also defines key performance indicators and responsibilities of both the service provider and the user. Penalties for not meeting targets and a dispute resolution process are usually also included<sup>17</sup>. Concluding a SLA allows both parties to manage expectations. Moreover, it makes sure that the business units receive only services that they want and for those they are willing to pay for.

### 3. Strategic Advantages

Strategic advantages play an important role in shared services. Shared services use IT for strategic innovation instead of tactical automation<sup>18</sup>. Executives in the operating units can focus their full attention on their front-office activities, know-how is retained inside the

organization, dependence on a third party is avoided, top management has easy access to information and there is increased flexibility for reorganizations.

- Business units can focus on their core competencies

Having a SSC take care of the support processes allows the management of the business units to focus their time and attention on their core business.

- Know-how is retained inside the organization and can be leveraged for other activities

Shared services are sometimes referred to as internal outsourcing. When a business unit hands over its support processes to a third party, from its point of view, it does not make a big difference whether an internally owned SSC or an external third party takes over. From the top management perspective, it does. Shared services allow companies to retain know-how inside the organization. Car producers, for instance, have realized that the most lucrative part of their business is to provide financing/leasing and insurance services to buyers. Had they outsourced these non-core activities to a third party, their profitability would have suffered.

- Reduced dependency on a third party (hold-up-problem)

If a firm hands over its support processes to a third party it becomes dependent on its services. The outsourcing provider may misuse this situation by attempting to renegotiate the terms of their contractual arrangements, claiming, for example, that its own costs are much higher than anticipated. It may “hold up<sup>19</sup>” the firm, trying to extract a bigger portion of the quasi-rent, i.e. the difference between the best and second-best alternative to the firm. As the firm cannot easily and rapidly find another provider, it may indeed have to accept a higher price.

- Easier access to information for top management

Having a SSC allows top management to access information easier. Instead of contacting various support departments in the business units to aggregate reports, it only needs to deal with one entity. Moreover, it is also easier to fulfill the stipulations of the Sarbanes-Oxley-Act, as it is much easier to make sure that controls are in place in one SSC than in many different support organizations.

- More flexibility for reorganizations, acquisitions and divestments

Finally, shared services also provide more flexibility to a firm. Operating entities can be reorganized internally without having to consider support activities. In case a business unit is sold, the SSC often continues to provide its services to the business unit (at least for some time), generating external revenue.

Cost advantages	Service advantages	Strategic advantages
<ul style="list-style-type: none"> <li>• Economies of scale and scope</li> <li>• Reduced labor costs through the location in low-cost areas</li> <li>• Standardization and optimization of processes</li> <li>• Reduced soft- and hardware costs</li> </ul>	<ul style="list-style-type: none"> <li>• More expertise through specialization</li> <li>• Higher customer orientation</li> <li>• Managing expectations through service level agreements</li> </ul>	<ul style="list-style-type: none"> <li>• Business units can focus on their core competencies</li> <li>• Know-how remains inside the organization and can be leveraged for other activities</li> <li>• Reduced dependence on a third party (hold-up-problem)</li> <li>• Easier access to information for top management</li> <li>• More flexibility for reorganizations, acquisitions and divestments</li> </ul>

Table 2: Shared services advantages

## **Risks**

Although there are many advantages of moving to shared services, there certainly are also risks. Financial, process, and employee risks as well as an increased vulnerability to force majeure type events are amongst the biggest challenges a company faces on its shared services journey.

### 1. Financial Risk

- Establishing the SSC is more expensive than anticipated

Establishing a SSC is a large-scale change project that often requires substantial capital investment. More often than not it takes longer than anticipated to complete. Often, resistance of the business units and initial set-backs are underestimated in the planning phase.

- Cost savings are lower than anticipated

Once processes have been migrated from the business units to the SSC, cost savings may not materialize quickly. According to a JPMorgan/McKinsey study<sup>20</sup>, 60% of the cost reduction potential from shared services comes from process reengineering (approximately 20% come from geographic savings and scale benefits respectively). This stresses the necessity of not just performing the same processes in a different location, but to strive for ongoing process improvements. Also, costs in the business units may not decrease as anticipated. Employees that performed certain support activities on a part-time basis, sometimes continue to be on the payroll as they are indispensable for front-office activities.



## 2. Process Risk

### - Reduced flexibility for individual business needs

When the business units ran the support activities, they could tailor them to their needs. With shared services, procedural differences for the various internal customers are, whenever possible, eliminated. After all, the business model is based on the assumption that activities can be “shared”. As a consequence, flexibility is certainly reduced. Specific requirements are only met if the business units are prepared to pay a premium.

### - Reduced process quality and responsiveness

Business units often fear that a SSC will offer services in inferior quality. This may indeed be true, especially in the initial phase after the handover of the processes. Moreover, a SSC is still an in-house monopolist. Top management does not grant its business units the right to hand over its support processes to an external third party easily (see below “Evolution over time”). Back-sourcing support processes from the SSC to the business units is, in most cases, not viable as well.

## 3. Employee Risk

### - Reduced morale and resistance to change

When a company announces that it will shift to a shared services model, support workers in the business units often leave as fast as they can. Even if many can be employed in the SSC or in another department, they know that their job will be altered significantly<sup>21</sup>. Business unit management morale suffers as well. They were used to be completely in charge for all aspects of their business. Handing over support activities to an internal SSC frequently is considered as taking responsibilities away from them.

- Loss of know-how

Frequently, business units used to run their own support processes for decades. When a SSC is established, old ways of doing things are discontinued. New SSC staff frequently monitors the business unit support workers during “work-shadowing” periods in order to understand all aspects of a process. However, the time available is often very limited and tacit knowledge cannot be explained. Moreover, established working relationships between staff workers and internal customers are altered and trust takes time to be built.

#### 4. Disaster Risk

It is not very likely that numerous geographically separated business unit may face a natural disaster at the same time. Having all its support processes in one SSC makes the companies much more vulnerable in case of an emergency, for instance a force majeure type natural disaster or an attack<sup>22</sup>.

In order to mitigate the risk, companies try to avoid putting “all eggs in one basket” and build back-up facilities. Hewlett-Packard established its main SSC in Bangalore, India. However, it also decided to continue its SSC in Barcelona, Spain and Guadalajara, Mexico. Even though these facilities provide services at a higher price, they can be expanded fast and take over if disaster strikes in Bangalore.

<b>Financial risk</b>	<b>Process risk</b>	<b>Employee risk</b>	<b>Disaster risk</b>
<ul style="list-style-type: none"> <li>• Establishing the SSC is more expensive than anticipated</li> <li>• Cost savings are lower than anticipated</li> </ul>	<ul style="list-style-type: none"> <li>• Reduced flexibility for individual business unit needs</li> <li>• Reduced process quality and responsiveness</li> </ul>	<ul style="list-style-type: none"> <li>• Reduced morale and resistance to change</li> <li>• Loss of know-how</li> </ul>	<ul style="list-style-type: none"> <li>• All support activities are endangered in case of a natural disaster</li> </ul>

Table 3: Shared services risks

## **Evolution over Time**

I have used the term “shared services journey” a few times throughout this paper. This is due to the fact that shared services are not a static concept, but evolve over time. Companies frequently move from a cost to a customer, and at least some of them, to a market and profit orientation<sup>23</sup>.

### 1. Cost Orientation

The main driver for companies to establish a SSC is to reduce the costs of its support services. Companies usually start with the consolidation of highly repetitive, transactional processes. A benchmarking study by PriceWaterhouseCoopers concluded that the savings companies realized by moving accounts payable, accounts receivable and general accounting to a SSC were 40%, 50% and 75% respectively<sup>24</sup>.

When a company embarks on a shared service strategy, business units are usually not allowed to opt-out easily but are required to hand over their selected processes to the SSC. The costs to operate the SSC are allocated back to the business units, usually based on metrics such as the number of invoices handled or the number of creditors served.

## 2. Customer Orientation

After basic transactional processes have been migrated to a SSC, companies usually try to expand the scope of the SSC by also including higher value added services. In a finance and accounting SSC, for example, instead of only processing invoices, also basic, non-business unit specific reporting and budgeting services are included.

Processes are improved continuously and detailed service level agreements are negotiated with the business units. Parameters, such as frequency or scope of the services, no longer need to be identical for all the business units. Industry- and country specific differences are increasingly being taken into account. As a general rule, the more work the business unit creates for the SSC, the more it needs to pay for a particular service. Customer satisfaction levels are measured frequently and built into the incentive system of the SSC employees.

## 3. Market Orientation

When a company has successfully established an efficient SSC that provides services to all its business units, it often wants to expand further and offer its services to third parties as well. Once the infrastructure is in place, the marginal costs of providing services to one more client are relatively low. However, in most cases priority is still given to the internal clients. Often, external customers are only served if extra capacity is available.

Offering services to third parties is a reality-check for many SSCs. They find out fast whether they are competitive and whether they can offer its services at market prices.

With the SSCs opening up, business units sometimes are also allowed to look for outside options. The SSC then loses its exclusive rights to provide all services to the business units. If an outside provider can offer a particular process at a much lower cost, they can opt-out and outsource their support processes. Often, the SSC becomes more like a preferred provider for the business units. SSCs frequently have a last call-option, i.e. they are offered to get the order if they are willing to match the best outside offer available.

#### 4. Profit Orientation

In the final stage of its development, a SSC becomes a business unit itself. It turns into a company that is run to make a profit. It has a large number of external clients, for whom it is an outsourcing provider. In most cases it treats internal and external customers alike, charging market prices to both of them. Often, it is run as an investment center, which can, at least partially, re-invest its own profits to generate new services in the future.

It is important to note that only a few companies have reached this development stage yet. Hewlett-Packard and IBM are good examples. Before both companies have entered the outsourcing arena, they only performed support services to their internal clients. However, they decided to leverage the know-how they gained internally to enter a new business segment, outsourcing, on a global scale.

Time →

<b>Cost orientation</b>	<b>Customer orientation</b>	<b>Market orientation</b>	<b>Profit orientation</b>
<ul style="list-style-type: none"> <li>• Consolidation of transactional processes</li> <li>• Focus on non-control activities</li> <li>• Realization of economies of scale and specialization</li> <li>• Costs are allocated to business units</li> <li>• Business units are required to use services</li> <li>• Goal: Cost reduction</li> </ul>	<ul style="list-style-type: none"> <li>• Inclusion of higher value added services</li> <li>• Customer determine scope and frequency of services</li> <li>• Service level agreements are negotiated with each business unit</li> <li>• Transfer prices are used to allocate costs</li> <li>• Goal: Service improvement</li> </ul>	<ul style="list-style-type: none"> <li>• SSC offers its services to external customers</li> <li>• SSC becomes a preferred provider for the business units, frequently having a last-call option</li> <li>• Business units can opt-out and outsource activities</li> <li>• Market prices are used for services</li> <li>• Goal: Selection of the most efficient provider</li> </ul>	<ul style="list-style-type: none"> <li>• SSC becomes a business unit that is run for profit</li> <li>• High percentage of external clients</li> <li>• SSC is run as an investment center and profits are (partially) re-invested into SSC business development</li> <li>• Goal: Profit maximization for the SSC</li> </ul>

Table 4: Orientation change (based on Quinn et al.)

## Conclusion

Communication networks have decreased the costs of exchanging information dramatically.

Processes that needed to be performed at a particular place in the past can nowadays be

carried out virtually everywhere. The rise of shared services is connected to these advances in technology.

Shared services have proved their viability in the last two decades. Shared service projects were successful in the past when top-level executive sponsorship was present. Companies that understood that establishing a SSC is a large-scale change project that cannot be delegated to technology managers, prospered. So did companies that built their SSC in small, digestible stages, starting with the low hanging fruits and communicating early success to a wide internal audience. Finally, integrating the business units as early as possible was a key ingredient for success.

However, establishing a SSC is just the beginning of the shared services journey. As I have pointed out earlier, the largest cost savings come from reengineering business processes after they have been transferred to a SSC. Further automation and “lights out processing” – processing without the interference of employees – will be necessary to keep the SSC competitive. In the future, SSC employees will become involved in routine processes only in case of mistakes or exceptions to a rule.

Measuring performance tenaciously and benchmarking it to world-class service providers is necessary. Shared services executives that cannot compete with the outside world know that their days are limited. They know that they need to continuously increase productivity and provide more value to the business units to avoid outsourcing.

Shared services are a viable business model that combines the advantages of centralization and decentralization. They allow organizations to take advantage of the benefits of economies

of scale that are usually associated with centralization. At the same time, they also enable organizations to benefit from service improvements, usually associated with decentralization.

Shared services are not a panacea that is equally suited for all companies. They are particularly beneficial to large organizations that perform similar support services in many business units.

Shared services have not yet reached its peak. Even within industries that have embarked on the establishment of SSCs early on there are still many companies that have implemented them solely in the area of finance and accounting or IT. These companies will expand them to other functions, such as HR or procurement, or will add more value added activities within their currently served functions to their SSC's portfolio. Moreover, there are still sectors, like for instance the public sector, which have lagged behind in the adoption of shared services. In these sectors many more organizations are still in the beginning of their shared services journey.



## Notes

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<sup>1</sup> Whereas my STM-480 focuses exclusively on the public sector, this paper does not.

<sup>2</sup> The term business units will be used throughout this paper for the internal customers of the SSC. It comprises divisions, regional units, subsidiaries, agencies etc.

<sup>3</sup> Davis gives an overview about the development of North American, European, Asian and Latin American SSCs.

<sup>4</sup> Ulbrich (2006), p. 196

<sup>5</sup> Ulbrich (2003), p. 3

<sup>6</sup> Quinn et al., p. 19

<sup>7</sup> Kagelmann, p. 69

<sup>8</sup> Davis, p. 2

<sup>9</sup> Davis, p. 4

<sup>10</sup> Janssen/Joha, p. 102

<sup>11</sup> Kagelmann, p. 89

<sup>12</sup> Weber, p. 329

<sup>13</sup> Werthmann/Rixen, p. 63, Hermes, p. 20

<sup>14</sup> Varian/Shapiro analyze costs and prices of information in chapter 2 of their book.

<sup>15</sup> Davis, p. 7

<sup>16</sup> Mechling (2006), p. 10

<sup>17</sup> Colman, p. 39

<sup>18</sup> Harvard Policy Group, Imperative #2

<sup>19</sup> The term „holdup“ problem was coined by Victor Goldberg

<sup>20</sup> JPMorgan, p.2

<sup>21</sup> Virtual SSC may be an option to mitigate this problem.

<sup>22</sup> See our STM-480 BCBS case “The worst thing that could happen”.

<sup>23</sup> Quinn et al., p. 24ff

<sup>24</sup> JPMorgan, p. 2

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